

FILED

APR 27 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ENIEL DENSIL DOWNER,
Defendant.

) INDICTMENT

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CASE NO.

Title 21, United States Code,
Sections 841(a)(1), (b)(1)(A),
(b)(1)(C), and 846

1:22 CR 213

JUDGE BOYKO

COUNT 1

(Possession with Intent to Distribute Cocaine,
21 U.S.C. § 841(a)(1) and (b)(1)(B))

The Grand Jury charges:

1. On or about March 25, 2022, in the Northern District of Ohio, Eastern Division, Defendant ENIEL DENSIL DOWNER did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

FORFEITURE

The Grand Jury further charges:

2. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; the allegation of Count 1 is incorporated herein by reference. As a result of the foregoing offense, Defendant ENIEL DENSIL DOWNER shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; any and all of his property used or intended to be used, in any

manner or part, to commit or to facilitate the commission of such violation; including, but not limited to, the following:

- a. Titan Tiger .38 special revolver serial #0088535 loaded with 6 rounds;
- b. Colt Government Pocketlite .380 pistol, serial GP10610; and
- c. Raven Arms Model MP-25, .25 Auto pistol, serial 1875829.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002